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Individually and on behalf of all others similarly situated

[Additional counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

Paloma Scalise, Anna Cardoso, and Demarco
Evans, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

Chipotle Services LLC, DBA Chipotle
Mexican Grill, Inc.; and Does 1 through 20,
inclusive,

Defendants.

Case No. 23CV006629

Hon. Lauri A. Damrell – Dept. 22

**DECLARATION OF PALOMA SCALISE IN
SUPPORT OF PLAINTIFFS’
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

[Notice of Motion; Memorandum of Points and
Authorities; Declaration of Jonathan M. Lebe;
Declaration of Anna Cardoso; Declaration of
Demarco Evans; Declaration of Paul K. Haines;
Declaration of James R. Hawkins; Declaration of
___; and [Proposed] Order Filed Concurrently
Herewith]

Hearing Information:

Date: August 22, 2025

Time: 9:00 A.M.

Dept. 22

Reservation Number: A-06629-001

Action Filed: August 11, 2023

Trial Date: None Set

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1 7. I can fairly and adequately represent the interests of the class and I do not have
2 an interest adverse to the other class members. As I have suffered from the same kinds of wage
3 and hour abuses during my employment with Defendant, I have a substantial interest in the
4 outcome of this lawsuit.

5 8. After I first contacted my attorneys, I had an initial consultation and subsequent
6 conversations regarding the potential claims. I spent hours locating my documents I received from
7 Defendant, including company policy documents, paystubs, emails, and all other documents I had
8 received from Defendant while I had worked for it. I also spent additional hours reviewing the
9 documents with my attorneys. We discussed potential claims and legal options.

10 9. I have taken my duties as a class representative in this case seriously and have
11 assisted my counsel in the prosecution of this lawsuit. Specifically, as a named Plaintiff in the
12 case, I was informed my deposition would likely be taken, that preparation for and the deposition
13 itself could potentially take several days and that it may likely be difficult while answering
14 questions under oath especially if it were videotaped. I started thinking about the deposition and
15 preparing myself for it early so I would be prepared and comfortable when the date and time
16 were set. My deposition was ultimately not taken.

17 10. During the case, I was informed by my counsel that Defendant had agreed to
18 mediate this case on April 17, 2024, and I was informed of the mediation process, what to
19 expect, and provided additional information to add to the mediation brief and damages model. In
20 preparing for mediation, I actively helped my attorneys, Mr. Lebe and Ms. Edborg, prepare for
21 the mediation, including through numerous and lengthy phone calls regarding my experiences
22 while employed by Defendant. For the mediation, I made myself personally available to speak
23 with my attorneys if they needed my input or assistance during the mediation. I also participated
24 in settlement discussions with my attorneys, informing them of my experiences and answering
25 any questions they asked me.

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1 11. Sometime after the agreement to settle, my attorneys sent the agreement for me to
2 review and sign. I reviewed the settlement agreement thoroughly. After reading the agreement,
3 I consulted with my attorneys before consenting to the terms in the settlement agreement.

4 12. I understood the settlement process involved mailing a notice to all members of the
5 Class telling them about the settlement and receiving a payment for the wage and hour violations
6 they suffered. It was explained to me that by suing on behalf of myself and other employees,
7 I could be subject to a certain stigma that is sometimes associated with someone who brings a class
8 action or PAGA action, which could impact my ability to find future employment as a cashier.
9 Although I recognized these risks, I still felt compelled to bring the action because I felt strongly
10 that the wage and hour practices at issue needed to be rectified, including among other things,
11 the failure to reimburse business expenses, failure to permit proper meal and rest breaks, and the
12 failure to pay all minimum and overtime wages due.

13 13. I believe this was a good settlement for my fellow class members. They are
14 receiving money they would not have otherwise had if I had not filed this case and done all this
15 work. I take great pride in that.

16 14. I believe that the request of \$15,000 as an enhancement is not only appropriate, but
17 reasonable in light of: (a) the emotional and mental stresses of dealing with this lawsuit, and the
18 potential of having a judgment entered against me if we had lost; (b) exposure to costs if the
19 Defendant would have won; (c) the real potential of losing job opportunities because I filed this
20 case; (d) giving a general release of all claims arising from my employment with Defendant,
21 which is broader than the release the class members have provided; and (e) for the substantial
22 hours I dedicated to this case both before and after this lawsuit was filed which was time lost from
23 being with my family, friends, and work. I estimate I have spent between fifteen to twenty hours
24 assisting my attorneys in the prosecution of this action.

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1 15. As part of the settlement, I also agreed to a general release of claims and waiver of
2 Civil Code section 1542. This general release includes past and present claims against Defendant.

3 I declare that under the penalty of perjury under the laws of the State of California and the
4 United States of America that the foregoing is true and correct. Executed on Jul 25, 2025 in
5 Roseville in the State of California.

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Paloma B Scalise (Jul 25, 2025 20:02:13 PDT)

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